

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KUMON NORTH AMERICA, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 07 C 7254
)	
STEPS TO SUCCESS, INC.)	JUDGE NORGLÉ
and PALI SHAH,)	MAGISTRATE JUDGE SCHENKIER
)	
Defendants.)	
)	

NOTICE OF EMERGENCY MOTION TO COMPEL DISCOVERY,
AND FOR RIGHT TO COMPLETE DISCOVERY
AND SUPPLEMENT PRE-TRIAL STATEMENT AND EXPERT REPORT.

To: Fredric A. Cohen
Cheng Cohen LLC
1101 W. Fulton Market, Suite 200
Chicago, IL 60607

PLEASE TAKE NOTICE that at 10:30 a.m. on Monday, May 2, 2008, if the Court allows, or as soon thereafter as counsel may be heard, we shall appear before the Honorable Judge Charles Norgle, or any other Judge sitting in his stead, in Courtroom 2341 of the Everett McKinley Dirksen Federal Building, 219 S. Dearborn Street, Chicago, Illinois, and present Motion To Compel Discovery, And For Right To Complete Discovery And Supplement Pre-Trial Statement And Expert Report, a copy of which is attached hereto and hereby served on you.

Dated: May 1, 2008

STEPS TO SUCCESS, INC.,
By its attorneys,

/s/ Rory A. Valas
Rory A. Valas
VALAS AND ASSOCIATES, P.C.
250 Summer Street
Boston, MA 02210
Telephone: (617) 399-2200
(U.S.D.C., N.D.Ill. Bar No. 90785292)

Carmen D. Caruso
Seth M. Rosenberg
Schwartz Cooper Chartered
180 N. LaSalle Street, Suite 2700
Chicago, Illinois 60601
(312) 346- 1300
(312) 782-8416 (fax)
Attorneys for Steps to Success, Inc.

CERTIFICATE OF SERVICE

Rory Valas, counsel for Steps to Success, Inc, states that on May 1, 2008, a copy of the foregoing Notice and the Motion referred to were served electronically on all counsel of record herein.

/s/ Rory A. Valas